

**REMARKS**

Claims 1 to 67, 69 to 73, 75 to 78 are pending in this application; claims 1, 5, 6, 47, 56, 58, 59, and 64 are amended herewith; claim 2 is cancelled herewith, and claims 79-86 are added herewith.

**Amendments made herewith**

Claims 1, 5, 6, 8, 47, 56, 64 are amended as shown in the claim listing and discussed below.

Claims 58 and 59 were amended to recite "a program" instead of "software", to improve language consistency with claim 56, on which claims 58 and 59 depend.

**Rejections under 35 USC § 112**

Claim 77 stands rejected under 35 USC § 112, as lacking support in the application as filed, since "there is no indication in the specification that the applicant's invention was meant to exclude operating system programs."

The Examiner stated that the specification is silent to teaching the requirement that existing program is a program other than an operating system. Applicant respectfully traverses. The statement made in the specification (page 2 lines 1 – 3) that the commands may comprise instructions to "an operating system or other software" explicitly recites two options: (1) that the instructions are to an operating system; and (2), that the instructions are not to an operating system, but to other software.

Accordingly, the specification is not silent to teaching the requirement that the existing program is a program other than an operating system, but rather explicitly stated as an available option.

Therefore, Applicants submit that claim 77 is well supported.

**Rejections under 35 USC § 102**

Claims 56-67 stand rejected under 35 USC 102 (a) as being anticipated by Estabrook. Applicant respectfully traverses.

**Independent claim 56**

Claim 56 is currently amended to clarify that the term "an existing program" relates to an executing program; and that the term "not through a browser interface associated with said

program" relates to a browser interface which is not a browser interface of the executing program.

Claim 56 as amended contains the limitation that the method includes executing a "browser including a browser interface, which is not one of the program's one or more browser interfaces".

Applicants respectfully submit that Internet Explorer taught by Estabrook is a browser interface of Windows operating system, as may be evident, for instance, from Estabrook itself, which teaches that using the Internet Explorer is a standard means for working with Windows. Thus, Estabrook does not teach a method of interacting with a program through a browser interface, which is not an interface of the program.

#### **Independent claim 64**

Claim 64 contains the limitation that the method comprising "modifying said first behavior to a second behavior by entering to said browser a text command directed to modify presentation of a WWW page; such that presentation of a WWW page under the second behavior would be different than under the first behavior."

In rejecting claim 64, the Examiner stated that, "entering another web address will make the web browser behave (i.e. display) information differently because it is a different page". Applicants respectfully traverse. Entering another web address will make the browser display other information, not display information differently.

The Examiner also stated that "if the applicant means that the WWW page remains constant, the claims need to be clarified".

The Applicant does not mean that the page remains necessarily constant, but that the way a page is displayed changes, even in case the page remains constant. For instance, if the first behavior is displaying text in large size font, and the second behavior is displaying text in medium size font, the display of any text-containing page would change.

This point has been clarified before, and is clarified again herewith by amending the claim to recite that "presentation of a WWW page under the second behavior would be different than presentation of said WWW page under the first behavior". This amendment is cosmetic, and does not change the scope of the claim. Nevertheless, Applicant hopes it would make the point clear enough to permit allowance of the claim.

**Rejections under 35 USC § 103**

Claims 1-8, 11-51, 53-55, 68-73, and 75-76 stand rejected under Section 103 as being unpatentable over Estabrook, in view of Moran. Applicant respectfully traverses.

Applicant respectfully submits that Moran is not prior art to rejected claim 1.

In the Examiner's response to this argument, the Examiner admits that Moran was published after the filing date of the application, but states that "it uses a technology (Windows 98), which was widely available before the filing date of the application". Even if this statement of the Examiner is true (which applicant does not admit), this is not a valid argument to deprive a claim from patentability. Wheels are widely available for centuries, and still, inventions using "wheel technology" may be patentable, if, for instance, the wheel is used in a new and non-obvious manner.

The Examiner also stated that "Applicant argues that Moran uses a batch file that does not predate the filing date of the application. However, batch files were notoriously well known in the art at the time of Windows 98". Applicant respectfully submits that whether batch files in general were known or not is irrelevant. The question is whether Moran's batch file, which is cited against the present application, was known before the filing date of the application. Moran does not provide any indication to this effect, and therefore, Moran's batch file is not prior art.

Applicants respectfully submit that the Examiner has not set forth a *prima facie* case of obviousness for the claim as amended.

For example, Estabrook and Moran relate each to an address bar interfacing with different programs. Estabrook relates to Internet Explorer address bar, which provides an interface to a web browser, and Moran relates to the Windows 98 address bar, which provides an interface to Windows 98. The Examiner himself based a rejection on the Examiner's finding that Internet Explorer is NOT part of the operating system, so the two programs underlying the address bars are different.

Applicant respectfully submits that it is not obvious to modify one program to have the functionality of the other, just because the two programs use a similar interface element.

Notwithstanding, patentability of the claims is argued below in view of Estabrook and Moran, as if Moran had been prior art and combinable with Estabrook.

**The Independent claims**

**Claim 1** includes the limitation that "said text string comprises a multiplicity of words and said command is identified according to at least one of said multiplicity of words."

The amendment finds support, for instance, on page 11 lines 2-6 of the application as filed.

Estabrook teaches using the Internet Explorer 4. In the current version of Internet Explorer, entering a multiplicity of words is interpreted as a command to search the Internet for these words. Put differently, in the Internet Explorer, a text string having more than one word is interpreted as a command to search, and the words are interpreted as the parameters of the command. The feature of Moran of executing a batch file with multiple words is at odds with the searching that would be evoked if run on the current version of Internet Explorer.

**Independent Claim 47** as amended, contains a limitation that "said parsing being at a location other than a domain indicated by said string". The amendment is made that it is the parsing (not the action) that is achieved at another location. Applicant respectfully contends that neither Estabrook nor Moran teaches or suggests parsing at a location other than a domain indicated by the string.

#### **The dependent claims**

The dependent claims are patentable over the cited art at least for the virtue of being dependent on a patentable base claim, and are not argued herein each individually in order to focus on the main issues and simplify examination. Nevertheless, Applicant respectfully draws the Examiner's attention to the following claims, the rejections of which are not established as a *prima facie* case of obviousness, even if a rejection of the base claim on which they depend were correct.

**Claim 5** is currently amended to clarify the change of behavior of the browser, similarly to the clarification included in claim 64. Neither Estabrook nor Moran teaches such change of behavior.

**Claim 6** is currently broadened to recite the limitations of claim 1, except for the text string not being limited to a multiplicity of words. Applicants believe claims 6 and 1 are directed to different inventions, and, if the Examiner is not convinced to allow claim 6 now, Applicant respectfully requests that claim 6 would be restricted, so as to allow discussing its patentability in a divisional application.

Claim 6 contains a limitation that "said command is directed to affecting translation of a future command into an action".

Applicant respectfully submits that no command, directed to affecting a translation of a future command into an action, is disclosed by the cited art. The Examiner states, under the heading of "response to arguments" that "Fig. 6.4 shows future commands which are highlighted and will be turned into actions as soon as they are activated". However, the claim is directed to *affecting the translation* of a future command into action, while the rejection is directed to *turning* a future command into action. Applicant respectfully submits that the Examiner has not set forth a *prima facie* case of obviousness against claim 6.

Claim 8 is amended to clarify that "said action has a physical manifestation outside of any computer hardware". The Examiner stated that the Applicants argued that "Estabrook and Moran do not teach a physical manifestation outside of the computer hardware". In fact, Applicant argues that while Estabrook and Moran may teach a physical manifestation outside of the user's computer hardware, they do not teach a physical manifestation outside of *any* computer program. Applicant believes this has been clear from the wording of the claim before the amendment, and made even clearer with the present amendment, which is only cosmetic, and does not change the scope of the claim.

Claim 35 contains the limitation that "said command comprises a natural language format command." Neither Estabrook nor Moran teaches natural language format commands. In his response to arguments, the Examiner stated that Estabrook teaches this limitation on page 84, "Navigate Your PC with the Address Bare, i.e. "The Internet"". Applicant respectfully submits that after careful reviewing of Estabrook page 84, Applicant failed finding any reference to natural language command format.

#### New claims 79 - 86

New claims 79 - 86 are added to specifically claim some embodiments of the invention.

Claims 79 - 81 are supported, for instance, on page 12 of the specification as filed, lines 12 - 27.

Applicants respectfully submit that the art of record includes no teaching, suggestion, or even a hint towards the subject matter of claims 79 - 86.

In view of the above remarks, applicant submits that the claims are patentable over the cited art and the specification fulfills all legal requirements. Allowance of the application is respectfully awaited. If, however, the Examiner is not convinced and the Examiner is of the opinion that a telephone conversation may forward the present application toward allowance, applicant respectfully requests that the Examiner call the undersigned at (703) 598-7851.

Respectfully submitted,



Martin D. Moynihan

Registration No. 40,338

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***Encl.:***

Petition for Extension (Two Months)

Request for Continued Examination (RCE)